

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CIARA STAFFORD,

Plaintiff,

v.

FISERV SOLUTIONS LLC AND CLOVER
NETWORKS, INC.,

Defendants.

Case No. 2:24-cv-10009-MEF-JRA

CIVIL ACTION

**JOINT STIPULATION OF DISMISSAL
PURSUANT TO RULE 41**

JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Ciarra Stafford (“Plaintiff”) and Defendants Fiserv Solutions LLC and Clover Networks, Inc. (“Defendants”) hereby stipulate that **Count Two (Battery)** and **Count Four (Constructive Discharge)** of Plaintiff’s Complaint are to be dismissed without prejudice, with the parties to bear their own costs and attorney’s fees. This dismissal shall be effective upon filing of this joint stipulation.

LAW OFFICES OF USMAAN SLEEMI LLC

66 Route 17 North, Suite 500

Paramus, NJ 07652

Attorneys for Plaintiff

s/ Usmaan Sleemi

Usmaan Sleemi, Esq.

Dated: January 6, 2025

SAUL EWING LLP

1270 Avenue of the Americas, Suite 2800

New York, NY 10020

Attorneys for Defendants

s/ Erik P. Pramschufer

Erik P. Pramschufer, Esq.

Dated: January 6, 2025